

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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Our File: 39,574-0

In Re:

MAUREEN A. DEVINE,

Debtor.

Case No. 17-16939 (RG)

Chapter 13

Judge: Rosemary Gambardella

Hearing: November 1, 2017

Hearing Time: 10:30 a.m.

**CERTIFICATION IN RESPONSE  
TO U.S. BANK TRUST, N.A. AS  
TRUSTEE FOR LSF9 MASTER  
PARTICIPATION TRUST'S  
MOTION TO VACATE THE  
AUTOMATIC STAY**

JEFFREY W. HERRMANN does hereby certify and say that:

1. I am a member of the firm Cohn Lifland Pearlman Herrmann & Knopf LLP, attorneys for Debtor, Maureen Devine.

2. I make this Certification in opposition to the motion to vacate stay filed by U.S. Bank Trust, N.A. as Trustee for LSF9 Master Participation Trust ("Movant").

3. Debtor has been working in good faith to sell her property located at 296 Pequest Road, Andover, New Jersey (the "Property").

4. Movant holds a first lien on the Property that will be paid in full at closing.

5. Movant filed a Proof of Claim on August 14, 2017 [claim no. 10] with an amendment on September 21, 2017, indicating a balance due of \$227,754.82. The proof of claim does not list a value for the Property.

6. Attached as **Exhibit "A"** is the MLS listing showing that the listing price on the property is currently \$299,000 as of October 5, 2017.

7. The Property consists of a three bedroom, two bath contemporary house on almost 10 acres of land.

8. Debtor believes that the value of the property exceeds the amount owed to Movant and closing costs.

9. If Movant's motion is granted and a sheriff sale takes place, the property will likely be sold for less than fair market value and the equity in the Property will be lost.

10. For this reason Debtor requests an additional 90 days to sell the property.

11. Once an offer is tendered, it will be presented to the Court for approval on notice to all interested parties.

12. I certify under penalty of perjury that the foregoing is true and correct.

DATED: October 24, 2017

/s/Jeffrey W. Herrmann  
JEFFREY W. HERRMANN

**EXHIBIT "A"**

10/5/2017

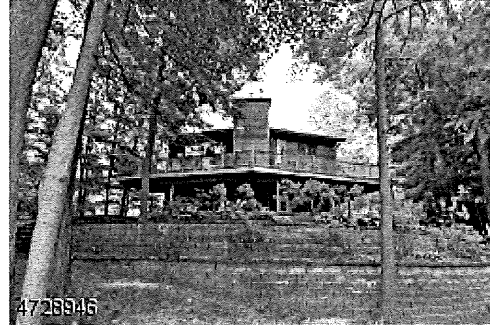
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Sussex\* Green Twp.\* (2808)

296 Pequest Rd\*

List Price: \$299,900

## Residential Client Full Report



MLS#: 3401822  
 Status: Active  
 Rms: 8  
 Bdrm: 3  
 FB: 2  
 HB: 0  
 ZIP: 07821-2116\*  
 RZIP:  
 Block: 24\*  
 Lot: 5\*  
 Unit #:  
 Floor #:  
 Bldg #:  
 FHA55+: No  
 Pets:

Section:  
 ZN:  
 GRS: GREEN HLS  
 MSJR: GREEN HLS  
 HS: NEWTON  
 Acres: 9.94\*  
 LtSz: 9.94 ACS\*  
 SqFt: 1743  
 CLR:  
 CL: No  
 GSMLS.com: Yes  
 YB/Desc/Ren: 2000 / Approximate /  
 PSubType: SinglFam  
 Style: Contemporary

LP: \$299,900  
 OLP: \$379,900  
 SP:  
 LD: 07/05/2017  
 UCD:  
 CD:  
 ADM: 91  
 DOM: 92  
 SDA:

Directions: Route 206 to Brighton Road to Pequest Road to # 296

Remarks: A Wildlife Lover's Paradise! This 3 bed, 2 bath contemporary home with cedar siding is truly a home among nature set upon almost 10 acres and encompasses a large part of Turtle Pond. The main living and dining room areas have high ceilings with lots of windows. From the main living area, step out onto the large deck that lines 3 sides of the house. Walkout from the basement onto the large paver patio with stairs to the trail that goes right to Turtle Pond, the wildlife and the boat ramp, where you can launch a paddle boat, row boat or canoe. On the way, stop along the campfire site and watch the sunset. This home has plenty of storage space both inside and out. Use the outdoor wood burning boiler on those chilly nights as a secondary source of heat. Come and see natural beauty at it's best.

## INTERIOR

Applncs: Cooktop-Gas, Dishwasher  
 Bsmnt: Yes / Finished, Walkout  
 Dine: Living/Dining Combo  
 Exclu: Refrigerators, Washer/Dryer, Garage Door Openers, Microwave  
 FirePl: 1 / Gas Fireplace, Living Room  
 Floor: Carpeting, Tile

Handicap Modified:  
 IntFeat: High Ceilings, Jetted Tub, Skylight  
 Kitch: Not Eat-In Kitchen  
 MastBr:  
 MstBath:  
 P-Use:  
 In-law Suite: No/

## EXTERIOR / OTHER FEATURES

Amnt:  
 Drive: 6 / 2 Car Width, Additional Parking  
 Exterior: CedarSiding  
 ExtFeat: Deck, Dock, Outbuilding(s), Patio, Storage Shed

Garage: 2 / Attached Garage  
 LotDesc: Pond On Lot  
 Pool: No/  
 Roof: Asphalt Shingle

## ROOM DIMENSIONS

LivRm: / First  
 Mstr: / Second  
 Rec Room: /Basement  
 LevelB: 1 Bedroom, Den, Rec Room, Storage Room, Utility Room  
 LevelG:  
 Level1: Bath(s) Other, Dining Room, Kitchen, Laundry Room, Living Room  
 Level2: 2 Bedrooms, Bath Main  
 Level3:  
 OthLev:  
 Attic:

Kitch: / First  
 Bed3: / Basement  
 Den: /Basement  
 Den: /  
 Bed4: /  
 Storage Room: /Basement

FamRm: /

## UTILITIES

Heat: Baseboard - Hotwater  
 Cool: Central Air  
 Fuel: Gas-PropaneLeased, OilTankAboveGround-Inside, Wood  
 Service:

Sewer: Septic  
 Utilities: Gas-Propane  
 Water: Well  
 WtrHt:

## FINANCIAL INFORMATION / TAX INFORMATION

Taxes: \$10,476 / 2016  
 Fee: \$ /  
 Other: \$ /  
 FeeIncl:

TaxRt: 3.469 / 2016  
 AppFee: \$  
 Easement: Unknown /

BldAsmt: \$176,600  
 FarmAsmt: No

LndAsmt: \$125,400  
 HmWrnty:

TotAsmt: \$302,000  
 OTP: Fee Simple

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\*\*Info. deemed RELIABLE but not GUARANTEED - ALL Room Sizes are Approx.\*\*

SHANNON HARFORD